

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	Case No. 2:22-cv-10759
Plaintiff,	)	
	)	
v.	)	
	)	
JOHN MCEACHERN,	)	
	)	
<u>Defendant</u>	)	

**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

To the Clerk:

Pursuant to Fed. R. Civ. P. 55(a), the plaintiff United States of America requests that the Clerk enter default against the defendant John McEachern for failure to plead or otherwise defend. Defendant was personally served with the summons and complaint at his residence under Fed. R. Civ. P. 4(e) on May 19, 2022. *See* ECF No. 3. The deadline for Defendant to answer or otherwise defend under Fed. R. Civ. P. 12 was June 9, 2022, which is 21 days after the date of service.

WHEREFORE, the plaintiff United States of America requests that the Clerk enter default against the defendant, John McEachern.

Respectfully submitted,

DAVID A. HUBBERT  
Deputy Assistant Attorney General

U.S. Department of Justice, Tax  
Division

/s/ Daniel M. Caves

DANIEL M. CAVES  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 55  
Washington, D.C. 20044  
202-514-6058 (v)  
202-514-5238 (f)  
Daniel.M.Caves@usdoj.gov

Local Counsel:

DAWN N. ISON  
United States Attorney

SUSAN K. DeCLERCQ (P60545)  
Assistant U.S. Attorney  
211 W. Fort Street, Ste. 2001  
Detroit, MI 48226  
(313) 226-9149  
[susan.declercq@usdoj.gov](mailto:susan.declercq@usdoj.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that that I filed the foregoing document with the Clerk of Court using the CM/ECF system on June 23, 2022. I further certify that on the same date I caused the foregoing document to be mailed by the United States Postal Service to the following non-CM/ECF participants:

John McEachern  
1644 Black Maple Drive  
Rochester Hills, MI 48309

/s/ Daniel M. Caves  
DANIEL M. CAVES  
Trial Attorney